

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA

In re: : Chapter 13
: :
Mila K. Shakopee, : :
: :
Debtor : Bankr. No. 23-10517-MDC

STIPULATION TO PERMIT LATE FILING OF PROOF OF CLAIM

The parties, Freedom Credit Union, by and through its counsel, Robert M. Morris, Esq., of Morris & Adelman, P.C. ("Morris"), and the debtor, Mila K. Shakopee, by and through her counsel, Brad J. Sadek, Esq., of Sadek and Cooper ("Sadek"), hereby stipulate as follows:

1. Freedom Credit Union is a creditor of the debtor pursuant to a judgment entered in the Court of Common Pleas of Delaware County in the case of *Freedom Credit Union v. Mila Shakopee*, docket number CV-2022-008598 (the "state court action"), on February 6, 2023, in the amount of \$25,750.87, and costs. A copy of the judgment along with the Pa R. Civ. P. 236 Notice is attached hereto as Exhibit "A" and incorporated by reference.

2. Morris represented Freedom Credit Union in the state court action.

3. Although Morris forwarded a copy of the judgment to Sadek on February 7, 2023, Sadek inadvertently omitted Morris from the service list when the debtor filed her Chapter 13

petition on February 23, 2023.

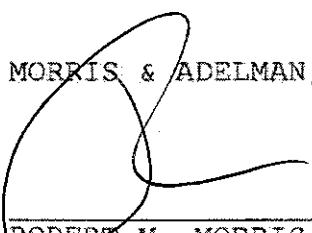
4. Although Freedom Credit Union received notice of the bankruptcy, Morris did not receive notice of it until May 26, 2023.

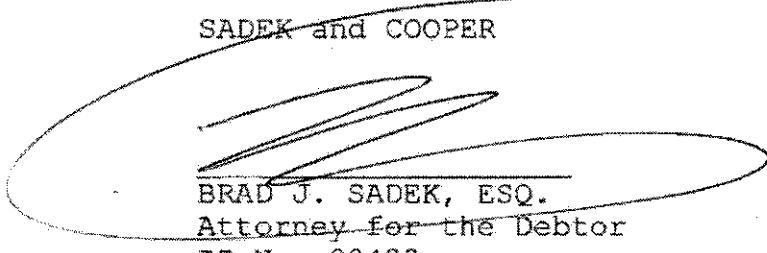
5. The deadline for filing claims was May 4, 2023.

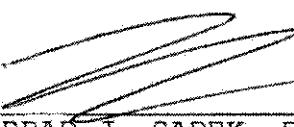
6. Freedom Credit Union desires to participate in the debtor's confirmed Chapter 13 plan.

7. Freedom Credit Union and the debtor hereby stipulate that Freedom Credit Union shall be permitted to file a proof of claim or before June 26, 2023, or fourteen calendar days following the date of approval of this stipulation, whichever is later.

MORRIS & ADELMAN, P.C.


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